

THE HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN YIHONG TECHNOLOGY CO.,
LTD.,

Plaintiff,

v.

DBEST PRODUCTS, INC.,

Defendant.

CASE NO. 2:24-cv-02043-KKE

DECLARATION OF KAUE
PEREIRA IN SUPPORT OF
DEFENDANT'S MOTION TO
DISMISS COMPLAINT

I, Kaue Pereira, declare as follows:

1. I have worked at dbest products Inc. ("dbest") for over three years. I am responsible for identifying products that I understand infringe dbest's patent and other intellectual property rights and reporting them to Amazon or other e-commerce platforms. Unless otherwise stated, I have personal knowledge of the facts set forth herein.

2. To protect its intellectual property, dbest, among other things, participates in Amazon's Brand Registry program and regularly monitors online retail websites like Amazon.com for products that infringe its patents and trademarks.

3. In early December 2024, using Amazon's Brand Registry portal, I filed a Policy Warning notice with Amazon, on behalf of dbest, alleging that certain stackable storage drawers sold on Amazon under ASINs B09ZKYQMVD, B09J2QWHC2, B0CGV3LT2H, and B0CGV3QXPH infringe dbest's U.S. Patent No. 129,103,576 (the "576 Patent"). The notice was based on my good faith belief that those products infringe the '576 Patent.

4. On or after December 20, 2024, I learned that Shenzhen Yihong Technology Co., Ltd., which I understand does business on Amazon.com under the name "Vtopmart," had filed a complaint commencing this action against dbest. Prior to the filing of the complaint, I did not receive any communications from Vtopmart or its counsel in connection with the above ASINs.

5. On or about December 22, 2024, I contacted Amazon and requested retraction of the notice against ASINs B09ZKYQMVD, B09J2QWHC2, B0CGV3LT2H, and B0CGV3QXPH and reinstatement of the listings on Amazon.com.

6. I subsequently learned from Amazon that it had reinstated the ASINs and listings on or about December 30, 2024, and I understand that, since then, Vtopmart's stackable storage drawers corresponding to the ASINs have been up for sale in the Amazon marketplace.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: February 20, 2025



Kaue Pereira